

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

PAULA FOOTE, individually and on behalf of others similarly situated,	:	
	:	CIVIL ACTION FILE NO. 1:19-cv-
	:	04381-LMM
Plaintiff,	:	
	:	
v.	:	
	:	
MATRIX WARRANTY	:	
SOLUTIONS, INC. d/b/a ELEMENT	:	
PROTECTION, CAR PROTECTION	:	
USA D/B/A CLEAR PATH and JOHN	:	
DAVIS,	:	
	:	
Defendants.	:	
	:	
	/	

AFFIDAVIT OF ANDREW R. PERRONG

1. My name is Andrew R. Perrong. I am over 18 years old. I am a resident of the Commonwealth of Pennsylvania and am not a party to this action. I can testify competently to the undersigned statements.
2. On January 28, 2020, I received a pre-recorded “robocall” to my telephone number 215-322-XXXX. The 215 area code is the area code for the greater Philadelphia, PA area. I received the call when I was physically located in the Commonwealth of Pennsylvania.
3. The illegal pre-recorded “robocall” played a message which advised me that

the caller was attempting to reach me about my “car’s extended warranty” and instructed me to press “1” to speak with a representative about extending my “car’s extended warranty.”

4. The pre-recorded message was generic and did not identify the caller, so I pressed “1” in an attempt to identify the source of the illegal pre-recorded robocall.

5. I was transferred to an agent who did not have any of my information, nor any information about the vehicle I drive.

6. That agent then transferred me to a man by the name of “Mark Wilson,” a “senior coverage specialist” with the “corporate office.”

7. Only after I indicated a desire to purchase the policy, “Mark” provided me a call back/customer service number of 866-327-6685.

8. The telephone number 866-327-6685 is associated with Car Protection USA, which is a Defendant in this action. *See, eg.* Better Business Bureau, *Car Protection USA*, (last visited Feb. 11, 2020), <https://www.bbb.org/us/ca/santa-ana/profile/auto-warranty-services/car-protection-usa-1126-172015718> (archived at <https://archive.is/efuFi>).

9. After providing my credit card number on the call, I received a credit card charge from a company called “Complete Advanced Automot”, which appears to be as much as the credit card company would allow to be printed of the full company name, “Complete Advanced Automotive Solutions LLC.”

10. I questioned "Mark" about the discrepancy, and was transferred to a female supervisor. That supervisor stated that their company was Car Protection USA, that Complete Advanced Automotive Solutions LLC handled the initial payment, and that future financing payments would be handled by a company called Mepco. The supervisor also stated that the policy administrator, the company that would handle all the claims, was Matrix, which is a Defendant to this action.

11. After asking further questions to clarify the relationship between the various entities that were named on the call, the agent simply hung up.

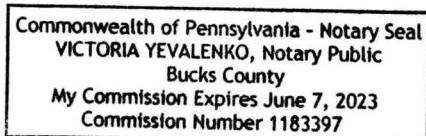
12. I recorded the call, and created a simultaneous backup copy using a police evidence forensic audio recorder. I would be glad to provide these recordings to the Court.

I declare under penalty of perjury that the foregoing is true and corr

Commonwealth of Pennsylvania, County of Bucks. Signed and sworn to before me on 02-12-2020 by Andrew R. Perrong.

Victoria Yevalenko

Notary Public



A R D

Andrew R. Perrong
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